

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
HAROLD ELLIS	:	VIOLATIONS:
	:	18 U.S.C. § 2113(a) (bank robbery - 8
	:	counts)
	:	18 U.S.C. § 2113(d) (armed bank robbery
	:	- 1 count)
	:	18 U.S.C. § 924(c) (possessing a firearm
	:	during a crime of violence - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 9, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

HAROLD ELLIS

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Wachovia Bank, 1165 S. Broad Street, lawful currency of the United States, that is, approximately \$12,000, belonging to, and in the care, custody, control, management and possession of the Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAROLD ELLIS

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Wachovia Bank, 1165 S. Broad Street, lawful currency of the United States, that is, approximately \$18,324.24, belonging to, and in the care, custody, control, management and possession of the Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 16, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAROLD ELLIS

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Wachovia Bank, 1165 S. Broad Street, lawful currency of the United States, that is, approximately \$15,676, belonging to, and in the care, custody, control, management and possession of the Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 14, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAROLD ELLIS

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Sovereign Bank, 3131 Market Street, lawful currency of the United States, that is, approximately \$8,481, belonging to, and in the care, custody, control, management and possession of the Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 12, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAROLD ELLIS

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Sovereign Bank, 3131 Market Street, lawful currency of the United States, that is, approximately \$8,515, belonging to, and in the care, custody, control, management and possession of the Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 29, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

HAROLD ELLIS

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Wachovia Bank, 1165 S. Broad Street, lawful currency of the United States, that is, approximately \$11,621, belonging to, and in the care, custody, control, management and possession of the Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 1, 2005, in Upper Darby, in the Eastern District of Pennsylvania, defendant

HAROLD ELLIS

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Citizens Bank, Glendale & Ludlow Streets, lawful currency of the United States, that is, approximately \$6,014, belonging to, and in the care, custody, control, management and possession of the Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 18, 2005, in Upper Darby, in the Eastern District of Pennsylvania, defendant

HAROLD ELLIS

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Alliance Bank, 210 S. 69th Street, lawful currency of the United States, that is, approximately \$2,196, belonging to, and in the care, custody, control, management and possession of the Alliance Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 28, 2005, in Chester Heights, in the Eastern District of Pennsylvania, defendant

HAROLD ELLIS

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the First Keystone Federal Savings Bank lawful currency of the United States, that is, approximately \$8,838 belonging to, and in the care, custody, control, management and possession of the First Keystone Federal Savings Bank, Route 1 & Stoney Brook Road, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant HAROLD ELLIS knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the First Keystone Federal Savings Bank, and other persons, by use of a dangerous weapon, that is, a .38 Taurus revolver, serial number LSF67832 loaded with five live rounds of ammunition.

In violation of Title 18, United States Code, Section 2113(d).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 28, 2005, in Chester Heights, in the Eastern District of Pennsylvania, defendant

HAROLD ELLIS

knowingly possessed a firearm, that is, a .38 Taurus revolver, serial number LSF67832 loaded with five live rounds of ammunition, in furtherance of a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**